

IN THE UNITED STATES COURT OF FEDERAL CLAIMS  
(Bid Protest)

CLASSIC AIR CHARTER, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
THE UNITED STATES,	)	No. 25-286C
	)	Judge Hertling
Defendant,	)	
	)	
and	)	
	)	
CSI AVIATION, INC.	)	
	)	
Defendant-Intervenor.	)	
	)	

DEFENDANT’S SECOND UNOPPOSED MOTION TO STAY

Defendant, the United States, respectfully requests that the Court stay all proceedings in this case for 14 days, through and including May 2, 2025. This is our second request for a stay for this purpose. Counsel for plaintiff, Classic Air Charter, Inc. (CAC), has indicated that CAC takes no position on this motion. Counsel for defendant-intervenor, CSI Aviation, Inc. (CSI), has indicated that CSI does not oppose this motion and reserves the right to object to any cancellation or other corrective action.

Good cause supports this second motion to stay. Counsel for the United States has been advised that the procurement cancellation action — recommended by Immigration and Customs Enforcement (ICE) procurement staff to terminate the existing award to CSI and cancel the solicitation that is the subject of this protest — is currently pending within the office of the Deputy Secretary of Homeland Security, who is the decision-maker, pending review and decision. If the Deputy Secretary accepts the recommendation to terminate the award and cancel

the solicitation, that would moot the underlying protest. A stay would avoid requiring the parties and the Court to expend additional resources by continuing the briefing schedule over a matter that may become moot.

For these reasons, we respectfully request that the Court stay all proceedings in this case for 14 days, through and including May 2, 2025.

Respectfully submitted,

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Director

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Dated: April 18, 2025